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July 6, 2000

The Honorable Rosalyn G. Millman
Deputy Administrator
National Highway Traffic Safety Administration
400 Seventh Street, S. W.
Washington, DC 20590

NHTSA-00-7013-31

Dear Deputy Administrator Millman:

**Re.: Occupant Crash Protection Final Rule; 49 CFR Parts 552, 571, 585, and 595
Docket No. NHTSA-00-7013; (65 Fed. Reg. 30680; May 12, 2000)**
Ref.: Our petition for reconsideration dated June 26, 2000; same subject

The Alliance of Automobile Manufacturers (Alliance), whose members are BMW, DaimlerChrysler, Fiat, Ford, General Motors, Isuzu, Mazda, Mitsubishi, Nissan, Porsche, Toyota, Volkswagen, and Volvo, hereby submits the enclosed supplemental petition for reconsideration concerning the final rule referenced above. This supplemental petition addresses certain aspects of the telltale requirements for passenger air bags in vehicles equipped with an automatic suppression feature.

If you or your staff have any questions concerning the issues raised in either the petition or comments attached herein, please call Mr. Vann Wilber at (248) 357-4717.

Sincerely yours,
Alliance of Automobile Manufacturers

Robert Strassburger
Vice President
Vehicle Safety &
International Harmonization

**BMW Group • DaimlerChrysler • Fiat • Ford Motor Company • General Motors
Isuzu • Mazda • Mitsubishi Motors • Nissan • Porsche • Toyota • Volkswagen • Volvo**

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ATTACHMENT A1 – Supplemental Petition for Reconsideration

AUTOMATIC SUPPRESSION FEATURE

Telltale Markings

Section S19.2.2 of the final rule specifies the passenger air bag telltale requirements for vehicles meeting the automatic suppression requirements of the rule. In general, this section requires that at least one telltale be provided and have the means to be illuminated whenever the passenger air bag is deactivated (except for an unoccupied seat). More specifically, this section stipulates that the telltale must be clearly visible from all front seating positions, and have the words "PASSENGER AIR BAG OFF" on the telltale or within 25m of the telltale. The Alliance believes this requirement is too restrictive and recommends that Section S19.2.2(b) be amended to allow the use of the abbreviation "PASS," in lieu of "PASSENGER". This abbreviation is widely understood in the U.S. plus would allow usage of the same telltale in many other countries and it is a recognized abbreviation in the French language. Most manufacturers will use second surface graphics so the telltale language will not be visible unless illuminated. Requiring the "PASSENGER" would probably preclude using second surface graphics due to package requirements (i.e., the telltale would be too large).

Telltale Visibility

Section 19.2.2(e) further specifies that the telltale must be visible to the driver and the right front passenger under all driving conditions, and may be adjustable to two or more levels of intensity. One of the permitted levels of intensity is a level that is "substantially discernible to a driver, of any age, who has adapted to ambient daytime driving conditions." The other level is a level that is "substantially discernible to a driver, of any age, who has adapted to ambient nighttime driving conditions." This provision goes on to state that the telltale may not be adjusted under any conditions to a level that is not visible, e.g., to the nighttime intensity during daytime driving conditions.

Section 19.2.2(e) contemplates that vehicle manufacturers may wish to wire the telltale required by the Section so as to provide for variable intensity of the light in the same manner as for other safety-critical telltales under FMVSS 101. FMVSS 101 provides that means shall be provided for making certain telltales visible "under all driving conditions," the level of intensity may be adjustable, but the level may not be adjustable "under any driving condition to a level that is invisible." See section 5.3.4. It is not clear why the intensity specifications under section 19.2.2 differ from those for other safety-critical telltales under FMVSS 101. This inconsistency unnecessarily complicates the design of the airbag telltale, and introduces new visibility criteria whose specific meaning is unclear, lack practicability, or are too vague to be enforceable ("substantially discernible," drivers of "any age"). Also, the rationale for the apparent prohibition on adjusting the intensity level to the nighttime intensity during daytime driving conditions is not clear, when the telltale may still be visible under those conditions and no such prohibition is established for other safety-critical telltales under FMVSS 101. This issue would arise, for example, if the vehicle headlights were turned on during daylight hours.

The Alliance therefore requests that NHTSA revise the language in section 19.2.2(e) to be consistent with that of FMVSS 101, by providing that the telltale may not be adjustable to a level that is "invisible", and by deleting the phrase ("e.g., to the nighttime intensity during daytime driving conditions") at the end of that section. As modified, that section would read as follows:

"19.2.2(e) Shall have means capable of making the telltale visible to the driver and right front passenger under all driving conditions. The means for providing the required visibility may be adjustable manually or automatically, except that the telltale(s) may not be adjustable under any driving condition to a level that is invisible."

The recommended revision further cures the practicability and enforcement concerns introduced by the use of such phrases as "substantially discernible" or persons or drivers of "any age."